

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CUTBERTO VIRAMONTES, <i>et al.</i> ,)	
)	
Plaintiffs,)	No. 21 CV 4595
)	
v.)	Judge Rebecca R. Pallmeyer
)	Magistrate Judge Susan E. Cox
THE COUNTY OF COOK, <i>et al.</i> ,)	
)	
Defendants.)	

EXPERT REPORT OF PROFESSOR LOUIS KLAREVAS

I. QUALIFICATIONS AND BACKGROUND

1. I am a security policy analyst and, currently, Research Professor at Teachers College, Columbia University, in New York. I am also a founding member of the Columbia University Scientific Union for the Reduction of Gun Violence (SURGE) as well as a member of the Regional Gun Violence Research Consortium at the State University of New York's Nelson A. Rockefeller Institute of Government.

2. I am the author of the book *Rampage Nation*, one of the most comprehensive studies on mass shootings in the United States.¹ I am also a co-investigator of a research project on school shootings funded by the National Institutes of Health. My current research examines the nexus between American public safety and gun violence.

¹ Louis Klarevas, *Rampage Nation: Securing America from Mass Shootings* (2016).

3. I am a political scientist by training, with a B.A. from the University of Pennsylvania and a Ph.D. from American University.

4. During the course of my nearly 25-year career as an academic, I have served on the faculties of the George Washington University, the City University of New York, New York University, and the University of Massachusetts. I have also served as a Defense Analysis Research Fellow at the London School of Economics and Political Science and as United States Senior Fulbright Scholar in Security Studies at the University of Macedonia.

5. In addition to having made well over 150 media and public-speaking appearances, I am the author or co-author of more than 25 scholarly studies and over 60 commentary pieces.

6. In the past four years, I have been retained by the California Attorney General's Office in the following cases brought in federal court: *Duncan v. Becerra*, Case No. 17-cv-1017-BEN-JLB, Southern District of California; *Wiese v. Becerra*, Case No. 17-cv-00903-WBS-KJN, Eastern District of California; *Miller v. Becerra*, Case No. 19-cv-1537 BEN-JLB, Southern District of California; *Jones v. Bonta*, Case No. 19-cv-01226-L-AHG, Southern District of California; and *Nguyen v. Bonta*, Case No. 20-cv-02470-WQH-MDD, Southern District of California. *Duncan* and *Wiese* both involve challenges to California's regulation of large-capacity magazines. *Miller* involves a challenge to California's regulation of assault weapons. *Jones* involves a challenge to California's regulation of firearm sales to individuals 18-to-20-years-old. *Nguyen* involves a challenge to California's regulation limiting the sale of certain firearms to one purchase per month. While I was never deposed in *Wiese*, *Miller*, or *Jones*, I was deposed in *Duncan* and *Nguyen* and I testified in court in *Miller*.

7. In 2021, I was also retained by the Government of Canada in the following cases which involved challenges to Canada's regulation of certain categories of firearms: *Parker and K.K.S. Tactical Supplies Ltd. v. Attorney General of Canada*, Federal Court, Court File No.: T-569-20; *Canadian Coalition for Firearm Rights, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-577-20; *Hipwell v. Attorney General of Canada*, Federal Court, Court File No.: T-581-20; *Doherty, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-677-20; *Generoux, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-735-20; and *Eichenberg, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-905-20. I testified under oath in a consolidated court proceeding involving all six cases in the Federal Court of Canada.

8. These are the only times that I have testified or been deposed in legal proceedings in the past four years.

9. A more detailed list of my professional experiences and credentials, including a full list of my publications, can be found in my curriculum vitae, which is appended to this Report as Exhibit A.

10. I have been retained by the Defendants to analyze and address mass shooting violence in the United States, including the relationship between assault weapons and mass shootings as well as the relationship between legal restrictions on assault weapons (i.e., bans) and mass shooting violence.

11. I am being compensated for my work in the present case at a rate of \$600 per hour for deposition and trial testimony and at a rate of \$480 per hour for all other services.

II. OPINIONS

12. It is my professional opinion, based upon my extensive review and analysis of data since 1980, that (1) in terms of individual acts of intentional violence, mass shootings presently pose the deadliest criminal threat to the safety and security of American society in the post-9/11 era, and the problem is growing nationwide; (2) mass shootings involving assault weapons, on average, have resulted in a substantially larger loss of life than similar incidents that did not involve assault weapons; and (3) jurisdictions that restrict the possession of assault weapons experience fewer mass shootings, per capita, than jurisdictions that do not restrict assault weapons. Based on these findings, it is my opinion that restrictions on assault weapons have the potential to significantly reduce the frequency and lethality of mass shootings.

II.A. Definitional Parameters

13. For purposes of this Report, it is helpful to establish working definitions of the terms “assault weapons” and “mass shootings.”

II.A.1. Assault Weapons

14. Assault weapons are generally assault-style firearms that fall into one of the following three categories: assault handguns, assault rifles, and assault shotguns. The modern-day roots of the term can be traced back to the 1980s, when gun manufacturers branded military-style firearms with the label in an effort to make them more marketable to civilians.²

² Violence Policy Center, “Assault Weapons and Accessories in America,” 1988, available at <https://vpc.org/publications/assault-weapons-and-accessories-in-america>; Violence Policy Center, “Bullet Hoses: Semiautomatic Assault Weapons—What Are They? What’s So Bad about Them?” 2003, available at <https://vpc.org/publications/bullet-hoses>; Phillip Peterson, *Gun*

15. In 1993, Cook County adopted Ordinance 93-O-37 (amended before taking effect by Ordinance 93-O-46), which restricted assault weapons in the county. In 2006 and 2013, Cook County, respectively, adopted ordinances 06-O-50 and 13-O-32, expanding the county's restrictions on assault weapons. Pursuant to the ordinances currently in effect in Cook County, commonly known as the Blair Holt Assault Weapons Ban, "it shall be unlawful for any person to manufacture, sell, offer or display for sale, give, lend, transfer ownership of, acquire, carry or possess any assault weapon."³ Specifically, the Cook County assault weapons ban regulates 44 rifle-model categories, 16 pistol-model categories, 5 shotgun-model categories, and all belt-fed semiautomatic firearms.⁴ Moreover, the county's ban applies to "copies or duplicates" of the particular models identified in the ordinance.⁵ A "conversion kit, part or combination of parts, from which an assault weapon can be assembled if those parts are in the possession or under the control of the same person" is also considered to be an assault weapon under The Blair Holt Assault Weapons Ban.⁶

16. In addition to identifying assault weapons by specific make and model, the Blair Holt Assault Weapons Ban defines assault weapons based on the features of a particular firearm (Table 1).

Digest Buyer's Guide to Assault Weapons (2008); and Erica Goode, "Even Defining 'Assault Rifles' Is Complicated," *New York Times*, January 16, 2013, available at <https://www.nytimes.com/2013/01/17/us/even-defining-assault-weapons-is-complicated.html>.

³ Cook County, Ill. Code § 54-212((a)).

⁴ Cook County, Ill. Code § 54-211(7).

⁵ *Ibid.*

⁶ Cook County, Ill. Code § 54-211(6).

Table 1. Definition of an Assault Weapon Pursuant to Blair Holt Assault Weapons Ban

Firearm	Required Features	Additional Requirements
Pistol	<ul style="list-style-type: none"> • Semiautomatic • Fixed magazine that has the capacity to accept more than 10 rounds of ammunition 	No additional requirements
Pistol	<ul style="list-style-type: none"> • Semiautomatic • Ability to accept a large-capacity magazine, detachable or otherwise 	At least one of the following additional requirements: <ul style="list-style-type: none"> • Any feature capable of functioning as a protruding grip that can be held by the non-trigger hand; • A folding, telescoping or thumbhole stock; • A shroud attached to the barrel, or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel; • A muzzle brake or muzzle compensator; or • The capacity to accept a detachable magazine at some location outside of the pistol grip.
Rifle	<ul style="list-style-type: none"> • Semiautomatic • Fixed magazine that has the capacity to accept more than 10 rounds of ammunition 	No additional requirements
Rifle	<ul style="list-style-type: none"> • Semiautomatic • Ability to accept a large-capacity magazine, detachable or otherwise 	At least one of the following additional requirements: <ul style="list-style-type: none"> • Only a pistol grip without a stock attached; • Any feature capable of functioning as a protruding grip that can be held by the non-trigger hand; • A folding, telescoping or thumbhole stock; • A shroud attached to the barrel, or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel; or • A muzzle brake or muzzle compensator.
Shotgun	<ul style="list-style-type: none"> • Revolving cylinder 	No additional requirements
Shotgun	<ul style="list-style-type: none"> • Semiautomatic 	At least one of the following additional requirements: <ul style="list-style-type: none"> • Only a pistol grip without a stock attached; • Any feature capable of functioning as a protruding grip that can be held by the non-trigger hand; • A folding, telescoping or thumbhole stock; • A fixed magazine capacity in excess of five rounds; • An ability to accept a detachable magazine; or • A grenade, flare or rocket launcher.
Any Firearm	<ul style="list-style-type: none"> • Semiautomatic • Belt-Fed 	No additional requirements

Source: Cook County, Ill. Code § 54-211.

17. For purposes of this Report, unless otherwise noted, assault weapons will be defined in a manner consistent with Cook County's Blair Holt Assault Weapons Ban.

II.A.2. Mass Shootings

18. In the United States, there is no consensus as to the definition of the term “mass shootings.” In particular, there is no statutory definition, nor is there any official administrative definition provided by American law enforcement or security agencies. As a result, we often rely on scholarly and media definitions to help conceptualize mass shootings.⁷

19. As the name implies, mass shootings are armed assaults resulting in multiple victims sustaining gunshot injuries. However, definitions tend to vary along two criteria: (1) *casualty threshold*—the minimum number of casualties required for a shooting to rise to the level of a mass shooting; and (2) *context*—the location and underlying motive of the shooting. Some of the earlier analyses of mass shootings employed a casualty threshold of 6 fatalities, not including the perpetrator(s), as the basic requirement for a shooting to be deemed a mass shooting.⁸ Over time, in an effort to sync the concept of a mass shooting with the definition of “mass murder”—a criminal act of violence resulting in 4 or more deaths—many scholars began embracing a lower threshold of 4 fatalities, not including the perpetrator(s).⁹ Today, both casualty thresholds are found in discussions of mass shootings.¹⁰

⁷ Klarevas, *Rampage Nation*, *supra* note 1.

⁸ See, for example, Gary Kleck, *Targeting Guns: Firearms and Their Control* (1997).

⁹ See, for example, Grant Duwe, Tomislav Kovandzic, and Carlisle E. Moody, “The Impact of Right-to-Carry Concealed Firearm Laws on Mass Public Shootings,” *Homicide Studies*, 6, November 2002, doi: 10.1177/108876702237341.

¹⁰ In the past few years, mass shootings have also been defined using a casualty threshold of 4 or more gunshot victims, regardless of whether the wounds were fatal or non-fatal. However, the data on this much broader conceptualization of mass shootings is very limited and, as such, far from comprehensive. As it does not lend itself to detailed analysis, especially the type of firearms used to perpetrate the shootings, it is not discussed further in this Report. Marisa Booty,

20. Similarly, while some academic and news accounts focus on all types of multiple-victim shootings, regardless of location or underlying motive,¹¹ many analyses restrict their focus to incidents that occurred largely in a public setting and were not perpetrated in pursuit of an underlying criminal activity (for example, domestic violence, gang violence, drug trafficking, or armed robbery). This subset of mass shootings is commonly referred to as “mass public shootings.”¹² As with the casualty threshold criterion, both versions of the context criterion (all incidents and public incidents) are found in discussions of mass shootings.

21. Table 2 provides a taxonomy of how mass shootings can be conceptualized based on these two criteria.¹³

Table 2. Taxonomy of Mass Shootings

		Context	
Casualty Threshold	All Incidents Regardless of Location or Motive	Only Incidents Largely in a Public Setting and Unrelated to an Underlying Criminal Activity	
	4 or More Deaths	Mass Murder Shootings	Mass Public Shootings
	6 or More Deaths	High-Fatality Mass Shootings	High-Fatality Mass Public Shootings

et al., “Describing a ‘Mass Shooting’: The Role of Databases in Understanding Burden,” *Injury Epidemiology*, 6, December 2019, doi: 10.1186/s40621-019-0226-7.

¹¹ See, for example, Paul M. Reeping, et al., “State Gun Laws, Gun Ownership, and Mass Shootings in the United States: A Cross-Sectional Time Series,” *BMJ*, 364, March 9, 2019, doi: 10.1136/bmj.l542.

¹² See, for example, Jillian Peterson and James Densley, *The Violence Project: How To Stop a Mass Shooting Epidemic* (2021).

¹³ As Table 2 demonstrates, high-fatality mass shootings, mass public shootings, and high-fatality mass public shootings are all subsets of mass murder shootings. It should be noted that, while there is some overlap between high-fatality mass shootings and mass public shootings, neither is a full subset of the other. High-fatality mass public shootings represent the mass shootings where there is overlap between high-fatality mass shootings and mass public shootings.

22. For purposes of this Report, I will analyze the following two types of mass shootings:

- High-fatality mass shootings—shootings resulting in 6 or more fatalities, not including the perpetrator(s), regardless of location or motive.
- Mass public shootings—shootings resulting in 4 or more fatalities, not including the perpetrator(s), so long as the act of violence occurred largely in a public setting and was not undertaken in pursuit of an underlying criminal objective.¹⁴

23. Both categories of mass shootings are well cataloged in two unique data sets that are publicly available, comprehensive, and verified.¹⁵ Overall, since January 1, 1980, there have been 117 high-fatality mass shootings resulting in a total of 1,126 deaths and 164 mass public shootings resulting in a total of 1,195 deaths. Each high-fatality mass shooting and mass public shooting that has occurred in the United States between January 1, 1980, and June 30, 2022, is, respectively, identified in Exhibits B and C.

¹⁴ Should it be deemed beneficial, it is also possible to perform an analysis of high-fatality mass public shootings in the United States. However, as comprehensive, verified data on all mass murder shootings (resulting in 4 or more fatalities, regardless of location and motive) in the United States, going back several decades, is not publicly available, analysis of this broader set of incidents is not currently possible for purposes of this Report.

¹⁵ Every high-fatality mass shooting that occurred in the United States since January 1, 1980, is drawn from a data set that I maintain. The identification of incidents (current through December 31, 2017) is published in the following two sources: Klarevas, *Rampage Nation*, *supra* note 1; Louis Klarevas, Andrew Conner, and David Hemenway, “The Effect of Large-Capacity Magazine Bans on High-Fatality Mass Shootings,” *American Journal of Public Health*, 109, December 2019, doi: 10.2105/AJPH.2019.305311. To identify high-fatality mass shootings that occurred since 2017, the Gun Violence Archive’s mass shooting data were consulted. “Gun Violence Archive,” available at <https://www.gunviolencearchive.org>. Every mass public shooting that occurred in the United States since January 1, 1980, is drawn from a data set maintained by The Violence Project. The source for this comprehensive data set is: The Violence Project (TVP), “Mass Shooter Database,” 2022, available at <https://www.theviolenceproject.org/mass-shooter-database>. The TVP database is current through May 5, 2022. In correspondence with TVP, the project director has identified three additional incidents through June 30, 2022, that will be included in the next iteration of the database. The list of mass public shootings in Exhibit C includes these three additional incidents.

II.B. Mass Shootings Are a Growing Threat to American Public Safety

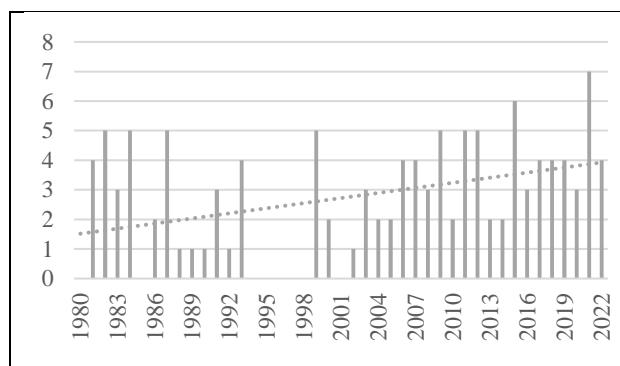
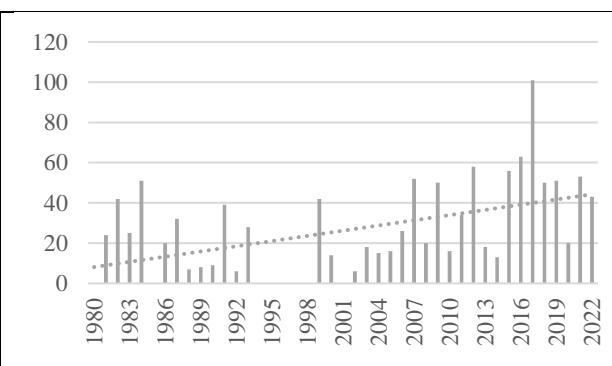
24. Examining mass-casualty acts of violence in the United States points to two disturbing patterns. First, as demonstrated in Table 3, the 8 deadliest individual acts of intentional criminal violence in the United States since the terrorist attack of September 11, 2001, have all been mass shootings. Second, as displayed in Figures 1-4, whether examined on a year-by-year basis or a decade-by-decade basis, the problem is on the rise.¹⁶

25. As shown in Figures 5-6, the high-fatality mass shootings as well as the mass public shootings from the most recent full decade (2010-2019) account for over 35% of all such respective incidents and over 45% of all such respective deaths in the past four decades. In other words, the most recent full decade is the worst decade on record in terms of the frequency and lethality of mass shootings in the United States. The obvious takeaway from these patterns and trends is that mass shooting violence poses a significant—and growing—threat to American public safety.

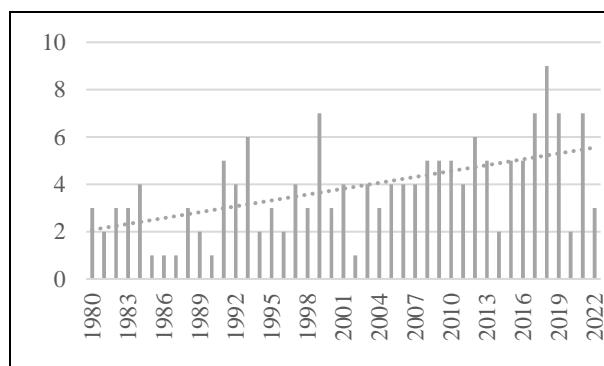
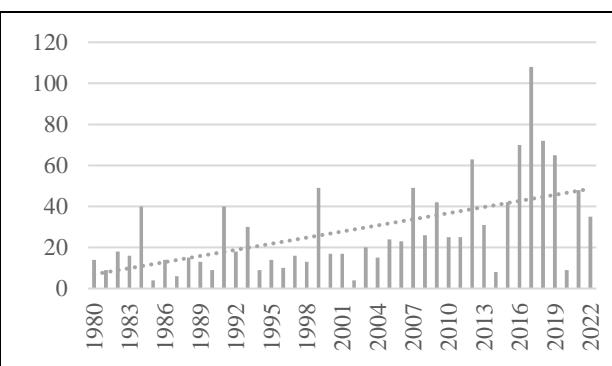
¹⁶ Adjusting the period of analysis to cover the most recent 40-year timeframe of January 1, 1983, through June 30, 2022—technically 39.5 years (as it is the latter half of 2022 at the time this Report is being drafted)—results in a slightly more inclined trajectory for high-fatality mass shooting incidents and deaths and a near identical upward trajectory for mass public shooting incidents and deaths (not displayed in this report). In other words, regardless of which 40-year timeframe one analyzes (1980-2019 or 1983-2022) and regardless of which definition of mass shootings one employs (high-fatality mass shootings or mass public shootings), the result is the same: mass shooting events and deaths are on the rise. Graphical depictions of the four most recent 10-year timeframes (1983-1992, 1993-2002, 2003-2012, and 2013-2022) are available upon request.

Table 3. The 8 Deadliest Acts of Intentional Criminal Violence in the U.S. since 9/11

Deaths	Date	Location	Type of Violence
60	October 1, 2017	Las Vegas, NV	Mass Shooting
49	June 12, 2016	Orlando, FL	Mass Shooting
32	April 16, 2007	Blacksburg, VA	Mass Shooting
27	December 14, 2012	Newtown, CT	Mass Shooting
25	November 5, 2017	Sutherland Springs, TX	Mass Shooting
23	August 3, 2019	El Paso, TX	Mass Shooting
21	May 24, 2022	Uvalde, TX	Mass Shooting
17	February 14, 2018	Parkland, FL	Mass Shooting

Figure 1. Annual Trends in High-Fatality Mass Shootings in the U.S., 1980-2022**Figure 1a. Incidents****Figure 1b. Deaths**

Note: Data for 2022 represents only a six-month period (January 1–June 30, 2022).

Figure 2. Annual Trends in Mass Public Shootings in the U.S., 1980-2022**Figure 2a. Incidents****Figure 2b. Deaths**

Note: Data for 2022 represents only a six-month period (January 1–June 30, 2022).

Figure 3. Ten-Year Trends in High-Fatality Mass Shootings in the U.S., 1980-2019

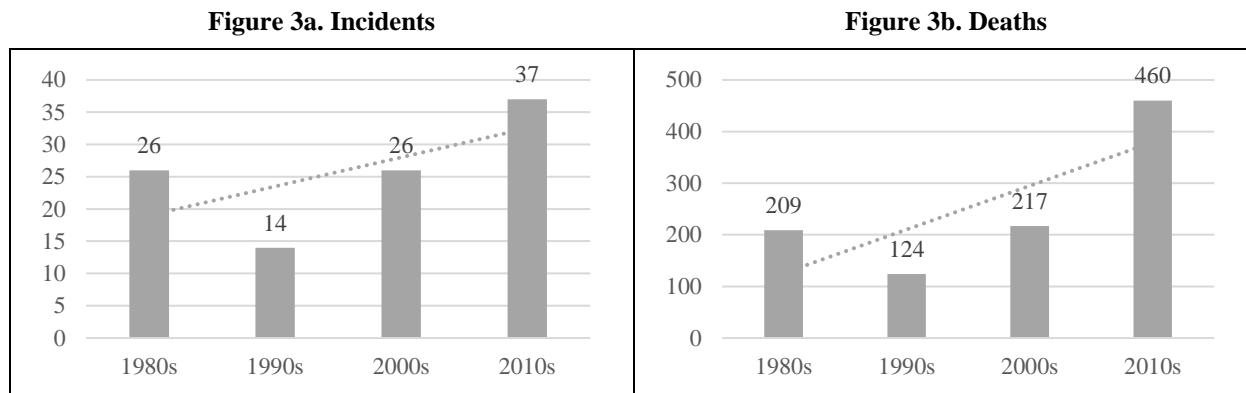


Figure 4. Ten-Year Trends in Mass Public Shootings in the U.S., 1980-2019

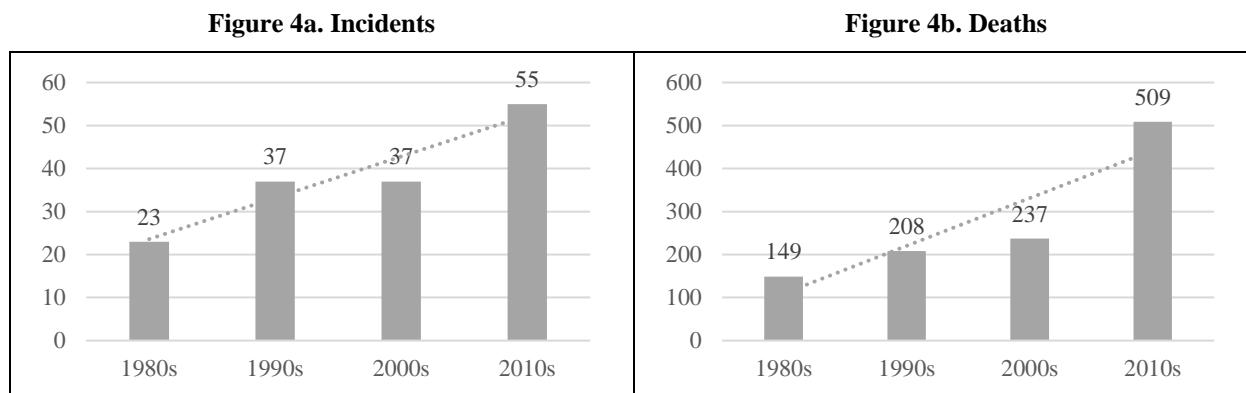


Figure 5. Share of High-Fatality Mass Shootings in the U.S. by Decade, 1980-2019

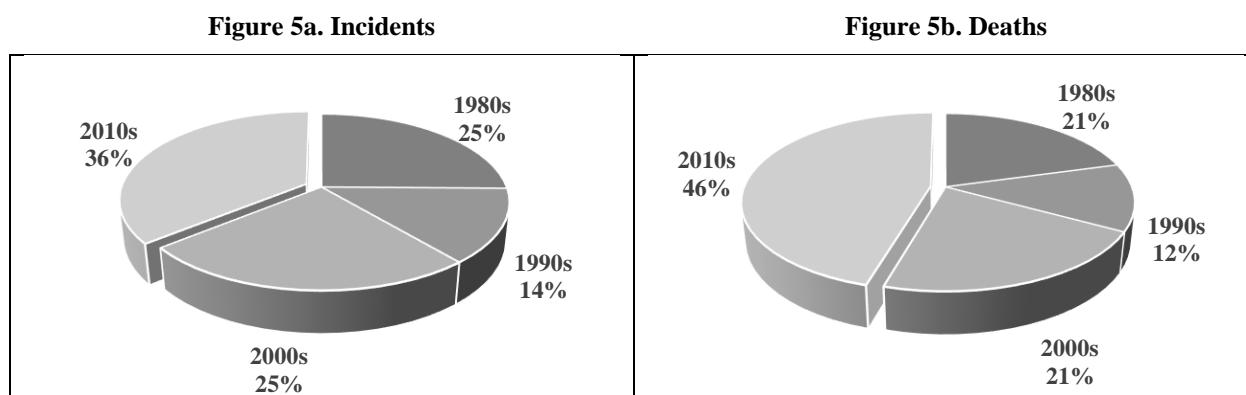
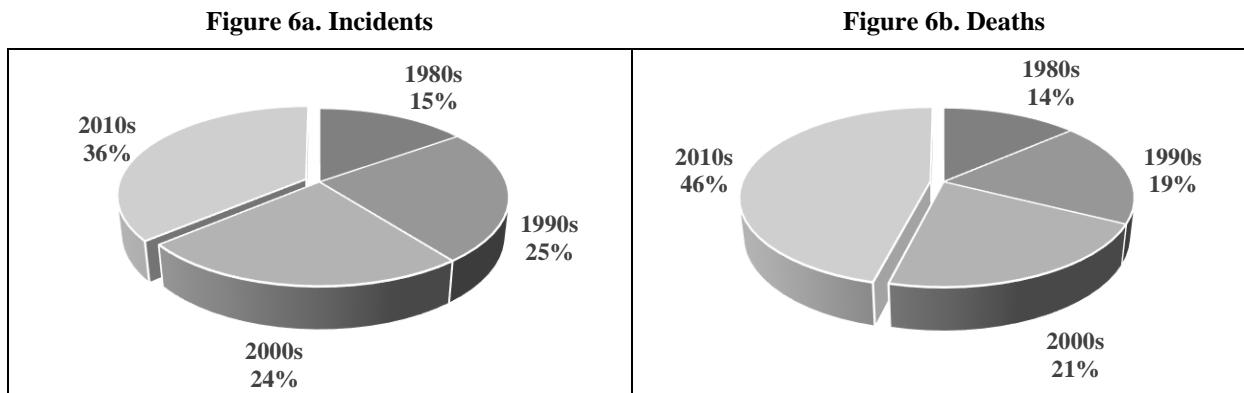
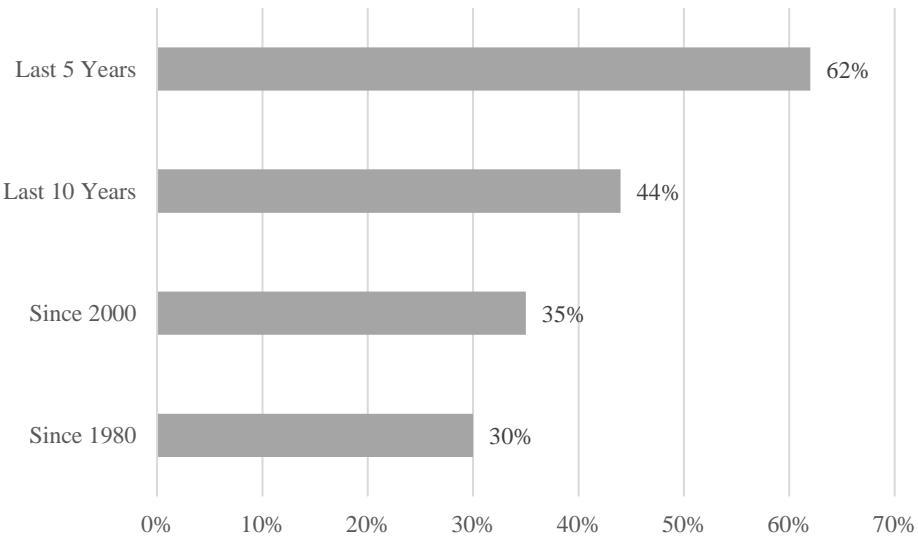


Figure 6. Share of Mass Public Shootings in the U.S. by Decade, 1980-2019**II.C. The Use of Assault Weapons Is a Major Factor in the Rise of Mass Shooting Violence**

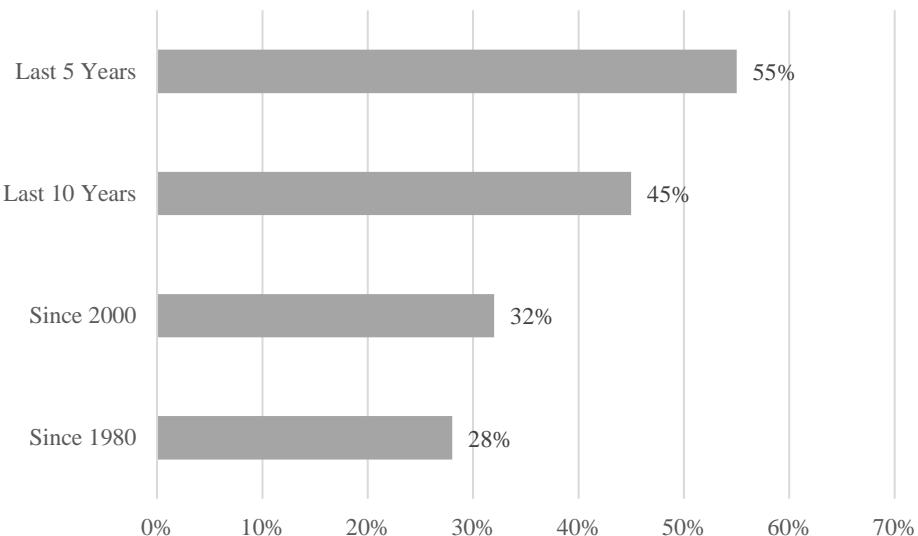
26. In addition to showing that the frequency and lethality of mass shootings is on the rise nationally, the data from the United States also point to another striking pattern: the use of assault weapons in the commission of mass shootings has grown in vast proportions. In both high-fatality mass shootings and mass public shootings, assault weapons have been used with increased frequency. As shown in Figures 7 and 8, the pattern is particularly marked of late, with over half of high-fatality mass shootings as well as mass public shootings in the last five years involving assault weapons. A similar, albeit more pronounced, pattern is found when examining fatalities in the last five years, with over 7-in-10 high-fatality mass shooting deaths as well as mass public shooting deaths resulting from incidents involving assault weapons, as shown in Figures 9 and 10. These trends clearly demonstrate that, among mass shooters, there is a growing preference of late for using assault weapons to perpetrate their attacks.

Figure 7. Share of High-Fatality Mass Shootings in the U.S. Involving Assault Weapons



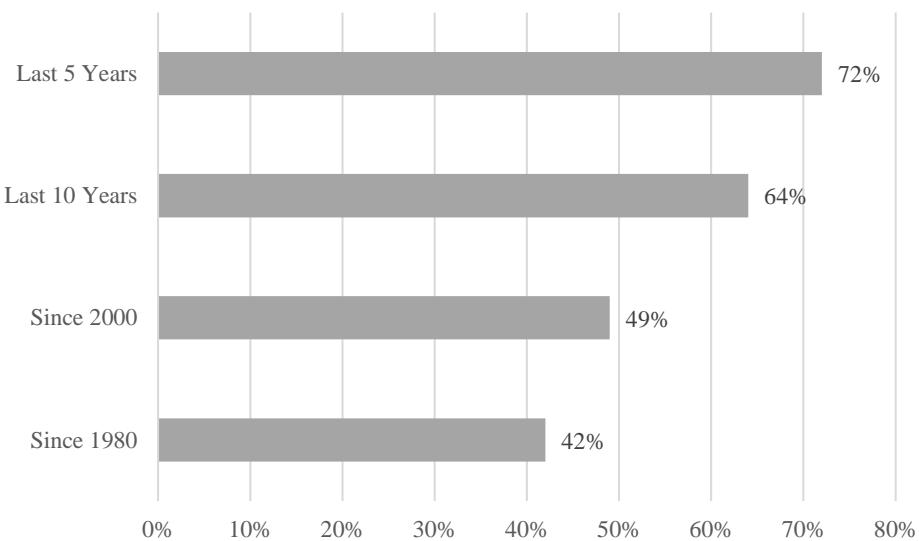
Note: The calculations in Fig. 7 exclude two high-fatality mass shootings (3/15/2020, Moncure, NC, 6 deaths; and 9/7/2020, Aguanga, CA, 7 deaths) in which the firearms used are unknown.

Figure 8. Share of Mass Public Shootings in the U.S. Involving Assault Weapons



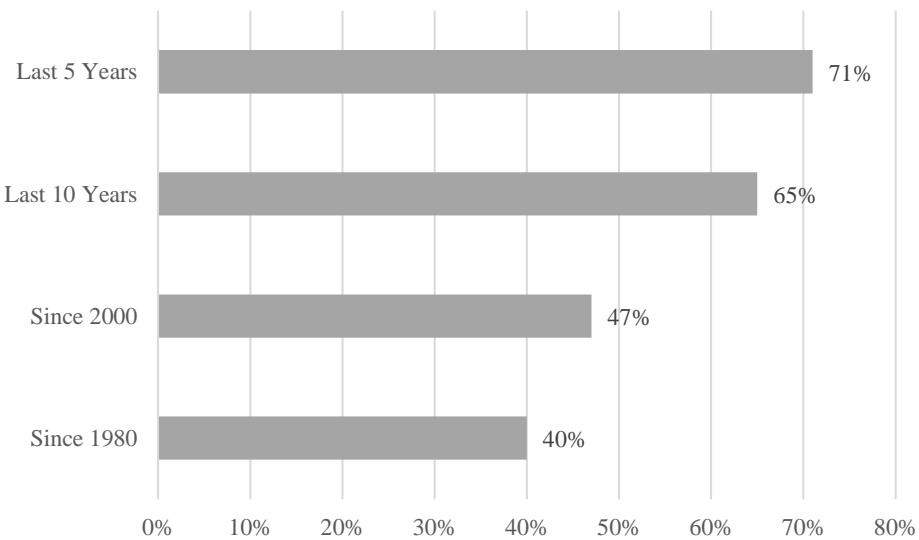
Note: The calculations in Fig. 8 exclude one mass public shooting (2/6/17, Yazoo City, MS, 4 deaths) in which the firearms used are unknown.

Figure 9. High-Fatality Mass Shooting Deaths Resulting from Incidents Involving Assault Weapons as a Share of All High-Fatality Mass Shooting Deaths in the U.S.



Note: The calculations in Fig. 9 exclude two high-fatality mass shootings (3/15/2020, Moncure, NC, 6 deaths; and 9/7/2020, Aguanga, CA, 7 deaths) in which the firearms used are unknown.

Figure 10. Mass Public Shooting Deaths Resulting from Incidents Involving Assault Weapons as a Share of All Mass Public Shooting Deaths in the U.S.



Note: The calculations in Fig. 10 exclude one mass public shooting (2/6/17, Yazoo City, MS, 4 deaths) in which the firearms used are unknown.

27. The growing use of assault weapons to carry out mass shootings is an obvious theme reflected in the data. The *disproportionate* resort to assault weapons by perpetrators of mass shootings is another clear theme. According to James Curcuruto of the National Sport Shooting Foundation (NSSF), a NSSF survey found that, as of December 2019, “modern sporting rifles”—which is an alternative term for assault rifles—made up approximately 4% of all firearms in circulation in American society (17.7 million out of an estimated 423 million firearms).¹⁷ If assault weapons were used in proportion to the percentage of modern sporting rifles in circulation, approximately 4% of all mass shootings would involve assault weapons. Yet, in 2019 (the year corresponding to NSSF’s survey data), 75% of all high-fatality mass shootings and 57% of all mass public shootings were committed with assault rifles (as shown in Exhibits B and C), far outpacing the relative prevalence of such firearms in American society.

28. The final pattern that stands out when examining the relationship between assault weapons use and mass shooting violence reflects the disproportionately greater lethality of associated with the use of assault weapons. For instance, returning to the list of the 8 deadliest individual acts of intentional criminal violence in the United States since the coordinated terrorist attack of September 11, 2001, besides all eight of the incidents being mass shootings, another prominent trait is that 7 of the 8 incidents involved assault weapons, as shown in Table 4.

¹⁷ Declaration of James Curcuruto in Support of Plaintiffs’ Motion for Preliminary Injunction, *Miller v. Becerra* (S.D. Cal. Dec. 6, 2019), No. 19-cv-1537-BEN-JLB, para. 15, available at https://storage.courtlistener.com/recap/gov.uscourts.casd.642089/gov.uscourts.casd.642089.22.13_1.pdf. The 2019 figures provided by the NSSF in *Miller v. Becerra* are consistent with Plaintiffs’ factual allegation asserted in the Complaint in the present case, wherein Plaintiffs allege, “counting just ‘modern sporting rifles’ (a category that includes semiautomatic AR-style and AK-style rifles), the number in circulation today approaches (and may exceed) twenty million.” Even using Plaintiffs’ own estimates, assault rifles do not exceed 5% of all firearms in circulation in American society. Plaintiffs’ Complaint, *Viramontes v. County of Cook* (N.D. Ill. Aug. 27, 2021), No. 21-cv-04595, para. 27.

Table 4. The Use of Assault Weapons in the 8 Deadliest Acts of Intentional Criminal Violence in the U.S. since 9/11

Deaths	Date	Location	Involved Assault Weapon(s)
60	October 1, 2017	Las Vegas, NV	✓ (AR-15)
49	June 12, 2016	Orlando, FL	✓ (AR-15)
32	April 16, 2007	Blacksburg, VA	
27	December 14, 2012	Newtown, CT	✓ (AR-15)
25	November 5, 2017	Sutherland Springs, TX	✓ (AR-15)
23	August 3, 2019	El Paso, TX	✓ (AK-47)
21	May 24, 2022	Uvalde, TX	✓ (AR-15)
17	February 14, 2018	Parkland, FL	✓ (AR-15)

29. Of the 115 high-fatality mass shootings since 1980 in which the type of firearm used is known, 35 involved assault weapons, resulting in 472 deaths. The average death toll for these 35 incidents is 13.5 fatalities per shooting. By contrast, the average death toll for the 80 incidents in which it is known assault weapons were not used (which resulted in 641 fatalities) is 8.0 fatalities per shooting (Table 5). Of the 163 mass public shootings since 1980 in which the type of firearm used is known, 45 involved assault weapons, resulting in 478 deaths. The average death toll for these 45 incidents is 10.6 fatalities per shooting. By contrast, the average death toll for the 118 incidents in which it is known assault weapons were not used (which resulted in 713 fatalities) is 6.0 fatalities per shooting (Table 5). In other words, since 1980, the use of assault weapons in high-fatality mass shootings and mass public shootings has resulted, respectively, in 69% and 77% increases in average fatalities per incident (Table 5). In the last 10 years, the differences in average fatality rates per incident are even more pronounced—far more than double: 7.8 versus 18.1 deaths per high-fatality mass shooting and 6.2 versus 13.9 deaths per mass public shooting. These amount, respectively, to 132% and 124% increases in the average death toll, attributed to the use of assault weapons (Table 5).¹⁸

¹⁸ The calculations in Para. 29 exclude two high-fatality mass shootings (3/15/2020, Moncure, NC, 6 deaths; and 9/7/2020, Aguanga, CA, 7 deaths) and one mass public shooting (2/6/17, Yazoo City, MS, 4 deaths) in which the firearms used are unknown.

Table 5. The Average Death Tolls Associated with the Use of Assault Weapons in Mass Shootings in the U.S. since January 1, 1980**5a. High-Fatality Mass Shootings**

	Average Death Toll for Incidents That Did Not Involve the Use of Assault Weapons	Average Death Toll for Incidents That Did Involve the Use of Assault Weapons	Percent Increase in Average Death Toll Associated with the Use of Assault Weapons
Since 1980	8.0 Deaths	13.5 Deaths	69%
Last 10 Years	7.8 Deaths	18.1 Deaths	132%

Note: The calculations in Table 5a exclude two high-fatality mass shootings (3/15/2020, Moncure, NC, 6 deaths; and 9/7/2020, Aguanga, CA, 7 deaths) in which the types of firearms used are unknown.

5b. Mass Public Shootings

	Average Death Toll for Incidents That Did Not Involve the Use of Assault Weapons	Average Death Toll for Incidents That Did Involve the Use of Assault Weapons	Percent Increase in Average Death Toll Associated with the Use of Assault Weapons
Since 1980	6.0 Deaths	10.6 Deaths	77%
Last 10 Years	6.2 Deaths	13.9 Deaths	124%

Note: The calculations in Table 5b exclude one mass public shooting (2/6/17, Yazoo City, MS, 4 deaths) in which the types of firearms used are unknown.

30. This review of the data supports an obvious takeaway: assault weapons are dangerous force multipliers when used to perpetrate mass shootings.

II.D. Restrictions on Assault Weapons Reduce Mass Shooting Violence and Save Lives

31. Around lunchtime on January 17, 1989, a man opened fire on children enjoying recess on the playground at Cleveland Elementary School in Stockton, California. Using an AK-47-like assault rifle, the gunman fired over 100 rounds in under 3 minutes, before committing suicide. The attack left 5 dead and another 32 wounded. All 5 of the murder victims and 29 of the 30 surviving gunshot-wound victims were children mostly of Cambodian and Vietnamese parents who had immigrated to the United States.¹⁹ In an effort to prevent future mass shootings like the Stockton rampage, the California legislature in May 1989 enacted the Roberti-Roos Assault Weapons Control Act—a statewide ban on assault weapons that went into effect on January 1, 1990.²⁰ While California was the first state to restrict assault weapons, New Jersey, Hawaii, Connecticut, and Maryland soon followed suit.²¹

32. Concerned by the threat posed by firearm violence to “the public health, safety, and welfare for the citizens of Cook County,” in 1993, the Cook County Board of Commissioners enacted countywide restrictions on assault weapons (Ordinance 93-O-37).²² Declaring that there was “no legitimate sporting purpose for the military style assault weapons being used on the

¹⁹ Jay Mathews, “Legacy of a Schoolyard Turned Killing Ground,” *Washington Post*, January 14, 1990, available at <https://www.washingtonpost.com/archive/politics/1990/01/14/legacy-of-schoolyard-turned-killing-ground/71679761-7402-4d39-a118-830255609680>.

²⁰ California State Senate, “Assault Weapons in California: A Case Study in Issue Management and the Media,” California Senate, Paper 223, 1989, available at http://digitalcommons.law.ggu.edu/caldocs_senate/223.

²¹ Giffords Law Center to Prevent Gun Violence, “Assault Weapons,” Giffords.org, available at <https://giffords.org/lawcenter/gun-laws/policy-areas/hardware-ammunition/assault-weapons>.

²² Cook County Ordinance 93-O-37.

street,” the Cook County Board of Commissioners took action that mirrored the steps taken by states that had implemented assault weapons bans in an effort to reduce violent crime involving assault weapons, including mass shootings.²³

33. In September 1994, moved to action by several high-profile shooting rampages, the U.S. Congress enacted a ban on assault weapons that applied to all 50 states plus the District of Columbia, bringing the entire country under the ban.²⁴ Like the state assault weapons bans that were implemented before it, the federal ban was aimed primarily at reducing mass shooting violence—an objective the ban sought to achieve by prohibiting the manufacture, importation, possession, and transfer of assault weapons not legally owned by civilians prior to the date of the law’s effect (September 13, 1994).²⁵ Congress, however, inserted a sunset provision in the law which allowed the federal ban to expire in exactly 10 years, if it was not renewed beforehand.

34. Cognizant that the federal ban might be allowed to sunset, Massachusetts and New York enacted their own state assault weapons bans while the federal ban was still in effect. As Congress ultimately chose not to renew the law, the federal ban expired on September 13, 2004. Since the federal ban’s expiration, the District of Columbia has been the only state-level jurisdiction to enact a ban on assault weapons.²⁶

²³ *Ibid.*

²⁴ Pub. L. No. 103-322, tit. XI, subtit. A, 108 Stat. 1796, 1996-2010 (codified as former 18 U.S.C. § 922(v), (w)(1) (1994)).

²⁵ Christopher Ingraham, “The Real Reason Congress Banned Assault Weapons in 1994—and Why It Worked,” *Washington Post*, February 22, 2018, available at <https://www.washingtonpost.com/news/wonk/wp/2018/02/22/the-real-reason-congress-banned-assault-weapons-in-1994-and-why-it-worked>.

²⁶ *Ibid.*; and Giffords, “Assault Weapons,” *supra* note 20.

35. Currently, over one-quarter of the U.S. population is subject to an assault weapons ban. The following is a list of the eight state-level jurisdictions that presently ban assault weapons and the effective dates of their bans: California (January 1, 1990); New Jersey (September 1, 1990); Hawaii (July 1, 1992, assault pistols only); Connecticut (October 1, 1993); Maryland (June 1, 1994, initially assault pistols but expanded to long guns October 1, 2013); Massachusetts (July 23, 1998); New York (November 1, 2000); and the District of Columbia (March 31, 2009). In addition to these jurisdictions, Cook County, Illinois, also continues to restrict assault weapons (November 18, 1993).

36. In the field of epidemiology, a common method for assessing the impact of laws and policies is to measure the rate of onset of new cases of an event, comparing the rate when and where the laws and policies were in effect against the rate when and where the laws and policies were not in effect. This measure, known as the incidence rate, allows public health experts to identify discernable differences, while accounting for variations in the population, over a set period of time. Relevant to the present case, calculating incidence rates across jurisdictions, in a manner that captures whether or not assault weapons bans were in effect during the period of observation, allows for the assessment of the effectiveness of such bans. In addition, fatality rates—the number of deaths, per population, that result from particular events across different jurisdictions—also provide insights into the impact of assault weapons bans on mass shootings.²⁷

²⁷ For purposes of this Report, incidence and fatality rates are calculated using methods and principles endorsed by the Centers for Disease Control. See Centers for Disease Control and Prevention, *Principles of Epidemiology in Public Health Practice: An Introduction to Applied Epidemiology and Biostatistics* (2012), available at <https://stacks.cdc.gov/view/cdc/13178>.

37. Since January 1, 1990, when the first state ban on assault weapons took effect, through June 30, 2022, there have been 91 high-fatality mass shootings and 141 mass public shootings in the United States (see Exhibits B and C).²⁸ Calculating incidence and fatality rates for this time-period, across jurisdictions with and without bans on assault weapons, reveals that states that prohibited assault weapons experienced 44% and 14% decreases, respectively, in the high-fatality mass shooting and mass public shooting incidence rates. They also experienced 54% and 37% decreases, respectively, in the high-fatality mass shooting and mass public shooting fatality rates, regardless of the weaponry used by the mass murderers (Tables 6-7).²⁹

38. When calculations go a step further and are limited to mass shootings involving assault weapons, the difference between the two jurisdictional categories (non-ban states and ban states) is even more pronounced. In the time-period between January 1, 1990, and June 30, 2022, accounting for population, states with assault weapons bans in place experienced 57% fewer high-fatality mass shootings involving the use of assault weapons and 32% fewer mass public shootings involving the use of assault weapons. Similarly, jurisdictions with bans in effect experienced 68% fewer deaths resulting from high-fatality mass shootings perpetrated with assault weapons and 57% fewer deaths resulting from mass public shootings perpetrated with assault weapons (Tables 6-7).

²⁸ There were no state bans on assault weapons in effect prior to January 1, 1990. Therefore, January 1, 1990, is the logical starting point for an analysis of the impact of assault weapons bans.

²⁹ For purposes of coding, between September 13, 1994, and September 12, 2004, the federal assault weapons ban was in effect. During that 10-year period, all 50 states and the District of Columbia were under legal conditions that prohibited certain assault weapons. As such, the entire country is coded as being under an assault weapons ban during the timeframe that the federal assault weapons ban was in effect.

39. Including Cook County in the calculations, alongside the state-level jurisdictions that banned assault weapons, resulted in slightly larger decreases in incidence and fatality rates (Tables 8-9).

Table 6. Incidence and Fatality Rates for High-Fatality Mass Shootings, by Whether or Not Assault Weapons Bans Were in Effect (January 1, 1990–June 30, 2022)

	Annual Average Population (Millions)	Total Incidents	Annual Incidents per 100 Million Population	Total Deaths	Annual Deaths per 100 Million Population
All High-Fatality Mass Shootings					
Non-AW Ban States	156.46	61	1.22	653	13.04
AW Ban States	138.69	30	0.68	264	5.95
Percentage Decrease in Rate for AW Ban States			44%		54%
High-Fatality Mass Shootings Involving Assault Weapons					
Non-AW Ban States	156.46	21	0.42	320	6.39
AW Ban States	138.69	8	0.18	92	2.07
Percentage Decrease in Rate for AW Ban States			57%		68%

Note: Population data are from U.S. Census Bureau's State Intercensal Data Sets, available at <https://www.census.gov/data/datasets.All.html>.

Table 7. Incidence and Fatality Rates for Mass Public Shootings, by Whether or Not Assault Weapons Bans Were in Effect (January 1, 1990–June 30, 2022)

	Annual Average Population (Millions)	Total Incidents	Annual Incidents per 100 Million Population	Total Deaths	Annual Deaths per 100 Million Population
All Mass Public Shootings					
Non-AW Ban States	156.46	80	1.60	671	13.40
AW Ban States	138.69	61	1.37	375	8.45
Percentage Decrease in Rate for AW Ban States			14%		37%
Mass Public Shootings Involving Assault Weapons					
Non-AW Ban States	156.46	25	0.50	313	6.25
AW Ban States	138.69	15	0.34	119	2.68
Percentage Decrease in Rate for AW Ban States			32%		57%

Note: Population data are from U.S. Census Bureau's State Intercensal Data Sets, available at <https://www.census.gov/data/datasets.All.html>.

Table 8. Incidence and Fatality Rates for High-Fatality Mass Shootings, by Whether or Not Assault Weapons Bans Were in Effect, Accounting for Cook County, Illinois, in Assault Weapons Ban Jurisdictional Category (January 1, 1990–June 30, 2022)

	Annual Average Population (Millions)	Total Incidents	Annual Incidents per 100 Million Population	Total Deaths	Annual Deaths per 100 Million Population
All High-Fatality Mass Shootings					
Non-AW Ban States	153.61	61	1.24	653	13.28
AW Ban States	141.54	30	0.66	264	5.83
Percentage Decrease in Rate for AW Ban States			47%		56%
High-Fatality Mass Shootings Involving Assault Weapons					
Non-AW Ban States	153.61	21	0.43	320	6.51
AW Ban States	141.54	8	0.18	92	2.03
Percentage Decrease in Rate for AW Ban States			58%		69%

Note: Population data are from U.S. Census Bureau's State Intercensal Data Sets, available at <https://www.census.gov/data/datasets.All.html>.

Table 9. Incidence and Fatality Rates for Mass Public Shootings, by Whether or Not Assault Weapons Bans Were in Effect, Accounting for Cook County, Illinois, in Assault Weapons Ban Jurisdictional Category (January 1, 1990–June 30, 2022)

	Annual Average Population (Millions)	Total Incidents	Annual Incidents per 100 Million Population	Total Deaths	Annual Deaths per 100 Million Population
All Mass Public Shootings					
Non-AW Ban States	153.61	79	1.61	666	13.55
AW Ban States	141.54	62	1.37	380	8.39
Percentage Decrease in Rate for AW Ban States			15%		38%
Mass Public Shootings Involving Assault Weapons					
Non-AW Ban States	153.61	25	0.51	313	6.37
AW Ban States	141.54	15	0.33	119	2.63
Percentage Decrease in Rate for AW Ban States			35%		59%

Note: Population data are from U.S. Census Bureau's State Intercensal Data Sets, available at <https://www.census.gov/data/datasets.All.html>.

40. Comparing Cook County (since its assault weapons ban went into effect in 1993) to the entire United States (since the first statewide assault weapons ban went into effect in 1990) indicates that Cook County has fared better than the nation as a whole in terms of limiting mass shooting violence. Since November 18, 1993, when Cook County's assault weapons ban went into effect, the county has never experienced a high-fatality mass shooting involving an assault weapon or a mass public shooting involving an assault weapon (Tables 10-11). Moreover, the average death tolls per incident since Cook County implemented its assault weapon ban have been 6.0 for high-fatality mass shootings and 5.5 for mass public shootings. On the other hand, the average death tolls for the entire United States since January 1, 1990, are 10.1 for high-fatality mass shootings and 7.4 for mass public shootings. Clearly, Cook County has experienced fewer average deaths per either type of mass shooting than the country as a whole. The differences are even more pronounced when comparing incidence and fatality rates for Cook County to those for the entire United States (Tables 10-11). Based on the above metrics, Cook County has experienced less mass shooting violence than the entire country—in terms of the frequency and lethality of high-fatality mass shootings as well as mass public shootings.³⁰

41. All of the above epidemiological calculations lead to the same conclusion: when assault weapons bans are in effect, per capita, fewer mass shootings occur and fewer people die in such shootings—especially incidents involving assault weapons, where the impact is most profound.

³⁰ The epidemiological analysis in this Report only runs through the first half of 2022. On July 4, 2022, there was a shooting perpetrated with an assault rifle that resulted in 7 deaths in Highland Park, IL, which is located in neighboring Lake County. As the shooting fell outside the scope of this Report's parameters, it was not included in the above calculations. It should be noted that Highland Park is a municipality that restricts assault weapons. In this incident, the suspect was reportedly a resident of Highwood, IL, which is also located in Lake County, just north of Highland Park. Because Lake County does not have a countywide assault weapons ban, the gunman was not prohibited from legally purchasing the assault rifle he used to commit his attack.

Table 10. Incidence and Fatality Rates for High-Fatality Mass Shootings: Comparing Entire United States and Cook County, Illinois

	Annual Average Population (Millions)	Total Incidents	Annual Incidents per 1 Million Population	Total Deaths	Annual Deaths per 1 Million Population
All High-Fatality Mass Shootings					
Entire United States	295.15	91	0.0096	917	0.0971
Cook County	5.24	1	0.0068	6	0.0408
High-Fatality Mass Shootings Involving Assault Weapons					
Entire United States	295.15	29	0.0031	412	0.0436
Cook County	5.24	0	--	0	--

Note: Population data are from U.S. Census Bureau's State Intercensal Data Sets, available at <https://www.census.gov/data/datasets.All.html>. The timeframe for entire United States is from when the first statewide assault weapons ban went into effect (January 1, 1990-June 30, 2022). The timeframe for Cook County, Illinois, is from when the Cook County assault weapons ban went into effect (November 18, 1993-June 30, 2022). Calculations for the entire United States include incidents and deaths in Cook County and account for the population of Cook County.

Table 11. Incidence and Fatality Rates for Mass Public Shootings: Comparing Entire United States and Cook County, Illinois

	Annual Average Population (Millions)	Total Incidents	Annual Incidents per 1 Million Population	Total Deaths	Annual Deaths per 1 Million Population
All Mass Public Shootings					
Entire United States	295.15	141	0.0149	1046	0.1107
Cook County	5.24	2	0.0136	11	0.0748
Mass Public Shootings Involving Assault Weapons					
Entire United States	295.15	40	0.0042	432	0.0457
Cook County	5.24	0	--	0	--

Note: Population data are from U.S. Census Bureau's State Intercensal Data Sets, available at <https://www.census.gov/data/datasets.All.html>. The timeframe for entire United States is from when the first statewide assault weapons ban went into effect (January 1, 1990-June 30, 2022). The timeframe for Cook County, Illinois, is from when the Cook County assault weapons ban went into effect (November 18, 1993-June 30, 2022). Calculations for the entire United States include incidents and deaths in Cook County and account for the population of Cook County.

III. SUMMARY

42. The opinions in this Report are held and offered with a reasonable degree of scientific certainty.

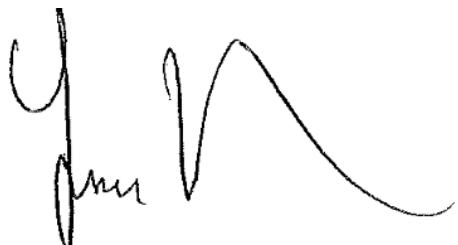
43. It is my professional opinion, based upon my extensive review and analysis of data since 1980, that (1) in terms of individual acts of intentional violence, mass shootings presently pose the deadliest criminal threat to the safety and security of American society in the post-9/11 era, and the problem is growing nationwide; (2) mass shootings involving assault weapons, on average, have resulted in a substantially larger loss of life than similar incidents that did not involve assault weapons; and (3) jurisdictions that restrict the possession of assault weapons experience fewer mass shootings, per capita, than jurisdictions that do not restrict assault weapons. Based on these findings, it is my opinion that restrictions on assault weapons have the potential to significantly reduce the frequency and lethality of mass shootings.

44. The main purpose of an assault weapons ban is to restrict the availability of assault weapons. The rationale is that, if there are fewer assault weapons in circulation, then potential mass shooters will either be dissuaded from attacking or they will be forced to use less-lethal firearms, resulting in fewer lives lost. The data buttress this line of reasoning, supporting the view of Cook County that restricting civilian access to assault weapons enhances public safety.

45. While imposing constraints on assault weapons will not prevent all future mass shootings, the evidence suggests that legislative efforts to deny gunmen access to assault weapons should result in a significant number of lives being saved.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 15, 2022, in Queens, NY.

A handwritten signature in black ink, appearing to read "Louis Klarevas". The signature is fluid and cursive, with a prominent vertical stroke on the left and a looped flourish on the right.

Louis Klarevas

EXHIBIT A

Louis J. Klarevas
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Education

Ph.D. International Relations, 1999

School of International Service
American University
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B.A. Political Science, *Cum Laude*, 1989

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Author

Rampage Nation: Securing America from Mass Shootings

Current Positions

Research Professor, Teachers College, Columbia University, New York, NY, 2018-Present

Faculty Affiliate, Media and Social Change Lab (MASCLab), Teachers College, Columbia University, New York, NY, 2019-Present

Professional Experience

Academic Experience (Presented in Academic Years)

Associate Lecturer, Department of Global Affairs, University of Massachusetts – Boston, Boston, MA, 2015-2020

Senior Fulbright Scholar (Security Studies), Department of European and International Studies, University of Macedonia, Thessaloniki, Greece, 2011-2012

Founder and Coordinator, Graduate Transnational Security Program, Center for Global Affairs, New York University, New York, NY, 2009-2011

Faculty Affiliate, A. S. Onassis Program in Hellenic Studies, New York University, New York, NY, 2007-2011

Clinical Faculty, Center for Global Affairs, New York University, New York, NY, 2006-2011

Adjunct Professor, Center for Global Affairs, New York University, New York, NY, 2004-2006

Assistant Professor of Political Science, City University of New York – College of Staten Island, Staten Island, NY, 2003-2006

Associate Fellow, European Institute, London School of Economics and Political Science, London, England, UK, 2003-2004

Defense Analysis Research Fellow, London School of Economics and Political Science, London, England, UK, 2002-2004

Visiting Assistant Professor of Political Science and International Affairs, George Washington University, Washington, DC, 1999-2002

Adjunct Professor of Political Science, George Washington University, Washington, DC, 1998-1999

Adjunct Professor of International Relations, School of International Service, American University, Washington, DC, 1994-1995

Dean's Scholar, School of International Service, American University, Washington, DC, 1989-1992

Professional Experience (Presented in Calendar Years)

Expert for Cook County, Illinois, *Viramontes v. County of Cook*, United States District Court for Northern District of Illinois, Case Number 21-cv-04595, Chicago, IL, 2022-

Expert for Government of Canada, *Parker and K.K.S. Tactical Supplies Ltd. v. Attorney General of Canada*, Federal Court, Court File No.: T-569-20, 2021-

Expert for Government of Canada, *Canadian Coalition for Firearm Rights, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-577-20, 2021-

Expert for Government of Canada, *Hipwell v. Attorney General of Canada*, Federal Court, Court File No.: T-581-20, 2021-

Expert for Government of Canada, *Doherty, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-677-20, 2021-

Expert for Government of Canada, *Generoux, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-735-20, 2021-

Expert for Government of Canada, *Eichenberg, et al. v. Attorney General of Canada*, Federal Court, Court File No.: T-905-20, 2021-

Expert for State of California, *Nguyen v. Bonta*, United States District Court for Southern District of California, Case Number 20-cv-02470-WQH-MDD, San Diego, CA, 2021-

Expert for State of California, *Jones v. Bonta*, United States District Court for Southern District of California, Case Number 19-cv-01226-L-AHG, San Diego, CA, 2021-

Expert for State of California, *Miller v. Becerra*, United States District Court for Southern District of California, Case Number 19-cv-1537-BEN-JLB, San Diego, CA, 2019-

Expert for Plaintiffs, *Ward et al. v. Academy Sports + Outdoor*, District Court Bexar County, Texas, 224th Judicial District, Cause Number 2017CI23341, Bexar County, TX, 2019-

Expert for State of California, *Duncan v. Becerra*, United States District Court for Southern District of California, Case Number 17-cv-1017-BEN-JLB, San Diego, CA, 2017-

Expert for State of California, *Wiese v. Becerra*, United States District Court for Eastern District of California, Case Number 17-cv-00903-WBS-KJN, Sacramento, CA, 2017-

Expert for State of Colorado, *Rocky Mountain Gun Owners v. Hickenlooper*, District Court for County and City of Denver, Colorado, Case Number 2013CV33879, Denver, CO, 2016-2017

Consultant, National Joint Terrorism Task Force, Federal Bureau of Investigation, Washington, DC, 2015

Writer, Prometheus Books, Amherst, NY, 2012-2015

Consultant, United States Institute of Peace, Washington, DC, 2005, 2008-2009

Research Associate, United States Institute of Peace, Washington, DC, 1992-1998

Faculty Advisor, National Youth Leadership Forum, Washington, DC, 1992

Courses Taught

Graduate

Counter-Terrorism and Homeland Security
International Political Economy
International Politics in a Post-Cold War Era
International Security
Machinery and Politics of American Foreign Policy
Role of the United States in World Affairs
Security Policy
Theories of International Politics
Transnational Security
Transnational Terrorism
United States Foreign Policy

Undergraduate

American Government and Politics
European-Atlantic Relations
International Political Economy
International Relations
Transnational Terrorism
United States Foreign Policy

Scholarship

“State Firearm Laws, Gun Ownership, and K-12 School Shootings: Implications for School Safety,” *Journal of School Violence*, 2022 (co-authored with Paul M. Reeping, Sonali Rajan, et al.)

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“Debunking of Elaborate Media Conspiracies an Important Trend,” *Kathimerini* (Greece), September 21, 2002 [Not Related to September 21-22, 2002, *National Herald* Piece with Similar Title]

“Cold Turkey,” *Washington Times*, March 16, 1998

“If This Alliance Is to Survive . . .,” *Washington Post*, January 2, 1998 [Reproduced as “Make Greece and Turkey Behave,” *International Herald Tribune*, January 3, 1998]

“Defuse Standoff on Cyprus,” *Defense News*, January 27-February 2, 1997

“Ukraine Holds Nuclear Edge,” *Defense News*, August 2-8, 1993

Commentaries Written for *New York Daily News* –

<https://www.nydailynews.com/authors/?author=Louis+Klarevas>

“Careful How You Talk about Suicide, Mr. President,” March 25, 2020 (co-authored with Sonali Rajan, Charles Branas, and Katherine Keyes)

“Only as Strong as Our Weakest Gun Laws: The Latest Mass Shooting Makes a Powerful Case for Federal Action,” November 8, 2018

“What to Worry, and not Worry, About: The Thwarted Pipe-Bomb Attacks Point to Homeland Security Successes and Vulnerabilities,” October 25, 2018

“After the Santa Fe Massacre, Bury the ‘Good Guy with a Gun’ Myth: Armed Staffers Won’t Deter Shooters or Keep Kids Safe,” May 22, 2018

“It’s the Guns (and Ammo), Stupid: Dissuading Killers and Hardening Targets Matter Too, But Access to Weapons Matters Most,” February 18, 2018

“The Texas Shooting Again Reveals Inadequate Mental-Health Help in the U.S. Military,” November 7, 2017

“Why Mass Shootings Are Getting Worse: After Vegas, We Urgently Must Fix Our Laws,” October 2, 2017

“N.Y. Can Lead the Nation in Fighting Child Sex Trafficking,” April 21, 2009 (co-authored with Ana Burdsall-Morse)

“Crack Down on Handguns – They’re a Tool of Terror, Too,” October 25, 2007

Commentaries Written for *The Huffington Post* – www.huffingtonpost.com/louis-klarevas

“Improving the Justice System Following the Deaths of Michael Brown and Eric Garner,” December 4, 2014

“American Greengemony: How the U.S. Can Help Ukraine and the E.U. Break Free from Russia’s Energy Stranglehold,” March 6, 2014

“Guns Don’t Kill People, Dogs Kill People,” October 17, 2013

“Romney the Liberal Internationalist?” October 23, 2012

“Romney’s Unrealistic Foreign Policy Vision: National Security Funded by Money Growing Trees,” October 10, 2012

“Do the Wrong Thing: Why Penn State Failed as an Institution,” November 14, 2011

“Holding Egypt’s Military to Its Pledge of Democratic Reform,” February 11, 2011

“The Coming Twivolutions? Social Media in the Recent Uprisings in Tunisia and Egypt,” January 31, 2011

“Scholarship Slavery: Does St. John’s ‘Dean of Mean’ Represent a New Face of Human Trafficking?” October 6, 2010

“Misunderstanding Terrorism, Misrepresenting Islam,” September 21, 2010

“Bombing on the Analysis of the Times Square Bomb Plot,” May 5, 2010

“Do the Hutaree Militia Members Pose a Terrorist Threat?” May 4, 2010

“Addressing Mexico’s Gun Violence One Extradition at a Time,” March 29, 2010

“Terrorism in Texas: Why the Austin Plane Crash Is an Act of Terror,” February 19, 2010

“Securing American Primacy by Tackling Climate Change: Toward a National Strategy of Greengemony,” December 15, 2009

“Traffickers Without Borders: A ‘Journey’ into the Life of a Child Victimized by Sex Trafficking,” November 17, 2009

“Beyond a Lingering Doubt: It’s Time for a New Standard on Capital Punishment,” November 9, 2009

“It’s the Guns Stupid: Why Handguns Remain One of the Biggest Threats to Homeland Security,” November 7, 2009

“Obama Wins the 2009 Nobel Promise Prize,” October 9, 2009

Commentaries for *Foreign Policy* – www.foreignpolicy.com

“The White House’s Benghazi Problem,” September 20, 2012

“Greeks Don’t Want a Grexit,” June 14, 2012

“The Earthquake in Greece,” May 7, 2012

“The Idiot Jihadist Next Door,” December 1, 2011

“Locked Up Abroad,” October 4, 2011

Commentaries for *The New Republic* – www.tnr.com/users/louis-klarevas

“What the U.N. Can Do To Stop Getting Attacked by Terrorists,” September 2, 2011

“Is It Completely Nuts That the British Police Don’t Carry Guns? Maybe Not,” August 13, 2011

“How Obama Could Have Stayed the Execution of Humberto Leal Garcia,” July 13, 2011

“After Osama bin Laden: Will His Death Hasten Al Qaeda’s Demise?” May 2, 2011

“Libya’s Stranger Soldiers: How To Go After Qaddafi’s Mercenaries,” February 28, 2011

“Closing the Gap: How To Reform U.S. Gun Laws To Prevent Another Tucson,” January 13, 2011

“Easy Target,” June 13, 2010

“Death Be Not Proud,” October 27, 2003 (correspondence)

Legal Analyses Written for *Writ* – writ.news.findlaw.com/contributors.html#klarevas

“Human Trafficking and the Child Protection Compact Act of 2009,” *Writ* (FindLaw.com), July 15, 2009 (co-authored with Christine Buckley)

“Can the Justice Department Prosecute Reporters Who Publish Leaked Classified Information? Interpreting the Espionage Act,” *Writ* (FindLaw.com), June 9, 2006

“Will the Precedent Set by the Indictment in a Pentagon Leak Case Spell Trouble for Those Who Leaked Valerie Plame’s Identity to the Press?” *Writ* (FindLaw.com), August 15, 2005

“Jailing Judith Miller: Why the Media Shouldn’t Be So Quick to Defend Her, and Why a Number of These Defenses Are Troubling,” *Writ* (FindLaw.com), July 8, 2005

“The Supreme Court Dismisses the Controversial Consular Rights Case: A Blessing in Disguise for International Law Advocates?” *Writ* (FindLaw.com), June 6, 2005 (co-authored with Howard S. Schiffman)

“The Decision Dismissing the Lawsuit against Vice President Dick Cheney,” *Writ* (FindLaw.com), May 17, 2005

“The Supreme Court Considers the Rights of Foreign Citizens Arrested in the United States,” *Writ* (FindLaw.com), March 21, 2005 (co-authored with Howard S. Schiffman)

Presentations and Addresses

In addition to the presentations listed below, I have made close to one hundred media appearances, book events, and educational presentations (beyond lectures for my own classes)

“Mass Shootings: What We Know, What We Don’t Know, and Why It All Matters,” keynote presentation to be delivered at the Columbia University Center for Injury Science and Prevention Annual Symposium, virtual meeting, May 2020

“K-12 School Environmental Responses to Gun Violence: Gaps in the Evidence,” paper presented at Society for Advancement of Violence and Injury Research Annual Meeting, virtual meeting, April 2020 (co-authored with Sonali Rajan, Joseph Erardi, Justin Heinze, and Charles Branas)

“Active School Shootings,” Post-Performance Talkback following Presentation of *17 Minutes*, Barrow Theater, New York, January 29, 2020 (co-delivered with Sonali Rajan)

“Addressing Mass Shootings in Public Health: Lessons from Security Studies,” Teachers College, Columbia University, November 25, 2019

“Rampage Nation: Securing America from Mass Shootings,” Swarthmore College, October 24, 2019

“Rampage Nation: Securing America from Mass Shootings,” University of Pennsylvania, February 9, 2018

“Treating Mass Shootings for What They Really Are: Threats to American Security,” Framingham State University, October 26, 2017

“Book Talk: Rampage Nation,” Teachers College, Columbia University, October 17, 2017

Participant, Roundtable on Assault Weapons and Large-Capacity Magazines, Annual Conference on Second Amendment Litigation and Jurisprudence, Law Center to Prevent Gun Violence, October 16, 2017

“Protecting the Homeland: Tracking Patterns and Trends in Domestic Terrorism,” address delivered to the annual meeting of the National Joint Terrorism Task Force, June 2015

“Sovereign Accountability: Creating a Better World by Going after Bad Political Leaders,” address delivered to the Daniel H. Inouye Asia-Pacific Center for Security Studies, November 2013

“Game Theory and Political Theater,” address delivered at the School of Drama, State Theater of Northern Greece, May 2012

“Holding Heads of State Accountable for Gross Human Rights Abuses and Acts of Aggression,” presentation delivered at the Michael and Kitty Dukakis Center for Public and Humanitarian Service, American College of Thessaloniki, May 2012

Chairperson, Cultural Enrichment Seminar, Fulbright Foundation – Southern Europe, April 2012

Participant, Roundtable on “Did the Intertubes Topple Hosni?” Zócalo Public Square, February 2011

Chairperson, Panel on Democracy and Terrorism, annual meeting of the International Security Studies Section of the International Studies Association, October 2010

“Trends in Terrorism Within the American Homeland Since 9/11,” paper to be presented at the annual meeting of the International Security Studies Section of the International Studies Association, October 2010

Panelist, “In and Of the World,” Panel on Global Affairs in the 21st Century, Center for Global Affairs, New York University, March 2010

Moderator, “Primacy, Perils, and Players: What Does the Future Hold for American Security?” Panel of Faculty Symposium on Global Challenges Facing the Obama Administration, Center for Global Affairs, New York University, March 2009

“Europe’s Broken Border: The Problem of Illegal Immigration, Smuggling and Trafficking via Greece and the Implications for Western Security,” presentation delivered at the Center for Global Affairs, New York University, February 2009

“The Dangers of Democratization: Implications for Southeast Europe,” address delivered at the University of Athens, Athens, Greece, May 2008

Participant, “U.S. National Intelligence: The Iran National Intelligence Estimate,” Council on Foreign Relations, New York, April 2008

Moderator, First Friday Lunch Series, “Intelligence in the Post-9/11 World: An Off-the-Record Conversation with Dr. Joseph Helman (U.S. Senior National Intelligence Service),” Center for Global Affairs, New York University, March 2008

Participant, “U.S. National Intelligence: Progress and Challenges,” Council on Foreign Relations, New York, March 2008

Moderator, First Friday Lunch Series, “Public Diplomacy: The Steel Backbone of America’s Soft Power: An Off-the-Record Conversation with Dr. Judith Baroody (U.S. Department of State),” Center for Global Affairs, New York University, October 2007

“The Problems and Challenges of Democratization: Implications for Latin America,” presentation delivered at the Argentinean Center for the Study of Strategic and International Relations Third Conference on the International Relations of South America (IBERAM III), Buenos Aires, Argentina, September 2007

“The Importance of Higher Education to the Hellenic-American Community,” keynote address to the annual Pan-Icarian Youth Convention, New York, May 2007

Moderator, First Friday Lunch Series, Panel Spotlighing Graduate Theses and Capstone Projects, Center for Global Affairs, New York University, April 2007

Convener, U.S. Department of State Foreign Officials Delegation Working Group on the Kurds and Turkey, March 2007

“Soft Power and International Law in a Globalizing Latin America,” round-table presentation delivered at the Argentinean Center for the Study of Strategic and International Relations Twelfth Conference of Students and Graduates of International Relations in the Southern Cone (CONOSUR XII), Buenos Aires, Argentina, November 2006

Moderator, First Friday Lunch Series, “From Berkeley to Baghdad to the Beltway: An Off-the-Record Conversation with Dr. Catherine Dale (U.S. Department of Defense),” Center for Global Affairs, New York University, November 2006

Chairperson, Roundtable on Presidential Privilege and Power Reconsidered in a Post-9/11 Era, American Political Science Association Annual Meeting, September 2006

“Constitutional Controversies,” round-table presentation delivered at City University of New York-College of Staten Island, September 2005

“The Future of the Cyprus Conflict,” address to be delivered at City University of New York College of Staten Island, April 2005

“The 2004 Election and the Future of American Foreign Policy,” address delivered at City University of New York College of Staten Island, December 2004

“One Culprit for the 9/11 Attacks: Political Realism,” address delivered at City University of New York-College of Staten Island, September 2004

“Were the Eagle and the Phoenix Birds of a Feather? The United States and the 1967 Greek Coup,” address delivered at London School of Economics, November 2003

“Beware of Europeans Bearing Gifts? Cypriot Accession to the EU and the Prospects for Peace,” address delivered at Conference on Mediterranean Stability, Security, and Cooperation, Austrian Defense Ministry, Vienna, Austria, October 2003

Co-Chair, Panel on Ideational and Strategic Aspects of Greek International Relations, London School of Economics Symposium on Modern Greece, London, June 2003

“Greece between Old and New Europe,” address delivered at London School of Economics, June 2003

Co-Chair, Panel on International Regimes and Genocide, International Association of Genocide Scholars Annual Meeting, Galway, Ireland, June 2003

“American Cooperation with International Tribunals,” paper presented at the International Association of Genocide Scholars Annual Meeting, Galway, Ireland, June 2003

“Is the Unipolar Moment Fading?” address delivered at London School of Economics, May 2003

“Cyprus, Turkey, and the European Union,” address delivered at London School of Economics, February 2003

“Bridging the Greek-Turkish Divide,” address delivered at Northwestern University, May 1998

“The CNN Effect: Fact or Fiction?” address delivered at Catholic University, April 1998

“The Current Political Situation in Cyprus,” address delivered at AMIDEAST, July 1997

“Making the Peace Happen in Cyprus,” presentation delivered at the U.S. Institute of Peace in July 1997

“The CNN Effect: The Impact of the Media during Diplomatic Crises and Complex Emergencies,” a series of presentations delivered in Cyprus (including at Ledra Palace), May 1997

“Are Policy-Makers Misreading the Public? American Public Opinion on the United Nations,” paper presented at the International Studies Association Annual Meeting, Toronto, Canada, March 1997 (with Shoon Murray)

“The Political and Diplomatic Consequences of Greece’s Recent National Elections,” presentation delivered at the National Foreign Affairs Training Center, Arlington, VA, September 1996

“Prospects for Greek-Turkish Reconciliation,” presentation delivered at the U.S. Institute of Peace Conference on Greek-Turkish Relations, Washington, D.C., June, 1996 (with Theodore A. Couloumbis)

“Greek-Turkish Reconciliation,” paper presented at the Karamanlis Foundation and Fletcher School of Diplomacy Joint Conference on The Greek-U.S. Relationship and the Future of Southeastern Europe, Washington, D.C., May, 1996 (with Theodore A. Couloumbis)

“The Path toward Peace in the Eastern Mediterranean and the Balkans in the Post-Cold War Era,” paper presented at the International Studies Association Annual Meeting, San Diego, CA, March, 1996 (with Theodore A. Couloumbis)

“Peace Operations: The View from the Public,” paper presented at the International Studies Association Annual Meeting, San Diego, CA, March, 1996

Chairperson, Roundtable on Peace Operations, International Security Section of the International Studies Association Annual Meeting, Rosslyn, VA, October, 1995

“Chaos and Complexity in International Politics: Epistemological Implications,” paper presented at the International Studies Association Annual Meeting, Washington, D.C., March, 1994

“At What Cost? American Mass Public Opinion and the Use of Force Abroad,” paper presented at the International Studies Association Annual Meeting, Washington, D.C., March, 1994 (with Daniel B. O’Connor)

“American Mass Public Opinion and the Use of Force Abroad,” presentation delivered at the United States Institute of Peace, Washington, D.C., February, 1994 (with Daniel B. O’Connor)

“For a Good Cause: American Mass Public Opinion and the Use of Force Abroad,” paper presented at the Annual Meeting of the Foreign Policy Analysis/Midwest Section of the International Studies Association, Chicago, IL, October, 1993 (with Daniel B. O’Connor)

“American International Narcotics Control Policy: A Critical Evaluation,” presentation delivered at the American University Drug Policy Forum, Washington, D.C., November, 1991

“American National Security in the Post-Cold War Era: Social Defense, the War on Drugs, and the Department of Justice,” paper presented at the Association of Professional Schools of International Affairs Conference, Denver, CO, February, 1991

Referee for Grant Organizations, Peer-Reviewed Journals, and Book Publishers

National Science Foundation, Division of Social and Economic Sciences

American Journal of Public Health

American Political Science Review

British Medical Journal (BMJ)

Comparative Political Studies

Injury Epidemiology

Journal of Public and International Affairs

Millennium

Political Behavior

Presidential Studies Quarterly

Violence and Victims

Brill Publishers

Johns Hopkins University Press

Routledge

Service to University, Profession, and Community

Member, Regional Gun Violence Research Consortium, Nelson A. Rockefeller Institute of Government, State University of New York, 2022-

Founding Member, Scientific Union for the Reduction of Gun Violence (SURGE), Columbia University, 2019-

Contributing Lecturer, Johns Hopkins University, Massive Open Online Course on Evidence-Based Gun Violence Research, Funded by David and Lucile Packard Foundation, 2019

Member, Group of Gun Violence Experts, *New York Times* Upshot Survey, 2017

Member, Guns on Campus Assessment Group, Johns Hopkins University and Association of American Universities, 2016

Member, Fulbright Selection Committee, Fulbright Foundation, Athens, Greece, 2012

Faculty Advisor, Global Affairs Graduate Society, New York University, 2009-2011

Founder and Coordinator, Graduate Transnational Security Studies, Center for Global Affairs, New York University, 2009-2011

Organizer, Annual Faculty Symposium, Center for Global Affairs, New York University, 2009

Member, Faculty Search Committees, Center for Global Affairs, New York University, 2007-2009

Member, Graduate Program Director Search Committee, Center for Global Affairs, New York University, 2008-2009

Developer, Transnational Security Studies, Center for Global Affairs, New York University, 2007-2009

Participant, Council on Foreign Relations Special Series on National Intelligence, New York, 2008

Member, Graduate Certificate Curriculum Committee, Center for Global Affairs, New York University, 2008

Member, Faculty Affairs Committee, New York University, 2006-2008

Member, Curriculum Review Committee, Center for Global Affairs, New York University, 2006-2008

Member, Overseas Study Committee, Center for Global Affairs, New York University, 2006-2007

Participant, New York Academic Delegation to Israel, Sponsored by American-Israel Friendship League, 2006

Member, Science, Letters, and Society Curriculum Committee, City University of New York-College of Staten Island, 2006

Member, Graduate Studies Committee, City University of New York-College of Staten Island, 2005-2006

Member, Summer Research Grant Selection Committee, City University of New York-College of Staten Island, 2005

Director, College of Staten Island Association, 2004-2005

Member of Investment Committee, College of Staten Island Association, 2004-2005

Member of Insurance Committee, College of Staten Island Association, 2004-2005

Member, International Studies Advisory Committee, City University of New York-College of Staten Island, 2004-2006

Faculty Advisor, Pi Sigma Alpha National Political Science Honor Society, City University of New York-College of Staten Island, 2004-2006

Participant, World on Wednesday Seminar Series, City University of New York-College of Staten Island, 2004-2005

Participant, American Democracy Project, City University of New York-College of Staten Island, 2004

Participant, Philosophy Forum, City University of New York-College of Staten Island, 2004

Commencement Liaison, City University of New York-College of Staten Island, 2004

Member of Scholarship Committee, Foundation of Pan-Icarian Brotherhood, 2003-2005, 2009

Scholarship Chairman, Foundation of Pan-Icarian Brotherhood, 2001-2003

Faculty Advisor to the Kosmos Hellenic Society, George Washington University, 2001-2002

Member of University of Pennsylvania's Alumni Application Screening Committee, 2000-2002

Participant in U.S. Department of State's International Speakers Program, 1997

Participant in Yale University's United Nations Project, 1996-1997

Member of Editorial Advisory Board, *Journal of Public and International Affairs*, Woodrow Wilson School of Public and International Affairs, Princeton University, 1991-1993

Voting Graduate Student Member, School of International Service Rank and Tenure Committee, American University, 1990-1992

Member of School of International Service Graduate Student Council, American University, 1990-1992

Teaching Assistant for the Several Courses (World Politics, Beyond Sovereignty, Between Peace and War, Soviet-American Security Relations, and Organizational Theory) at School of International Service Graduate Student Council, American University, 1989-1992

Representative for American University at the Annual Meeting of the Association of Professional Schools of International Affairs, Denver, Colorado, 1991

Affiliations, Associations, and Organizations (Past and Present)

Academy of Political Science (APS)

American Political Science Association (APSA)

Anderson Society of American University

Carnegie Council Global Ethics Network

Columbia University Scientific Union for the Reduction of Gun Violence (SURGE)

Firearm Safety among Children and Teens (FACTS)

International Political Science Association (IPSA)

International Studies Association (ISA)

New York Screenwriters Collective

Pan-Icarian Brotherhood

Pi Sigma Alpha

Regional Gun Violence Research Consortium

Society for Advancement of Violence and Injury Research (SAVIR)

United States Department of State Alumni Network

United States Institute of Peace Alumni Association

University of Pennsylvania Alumni Association

Grants, Honors, and Awards

Co-Investigator, A Nationwide Case-Control Study of Firearm Violence Prevention Tactics and Policies in K-12 School, National Institutes of Health, 2021-2024 (Charles Branas and Sonali Rajan MPIs)

Senior Fulbright Fellowship, 2012

Professional Staff Congress Research Grantee, City University of New York, 2004-2005

Research Assistance Award (Two Times), City University of New York-College of Staten Island, 2004

Summer Research Fellowship, City University of New York-College of Staten Island, 2004

European Institute Associate Fellowship, London School of Economics, 2003-2004

Hellenic Observatory Defense Analysis Research Fellowship, London School of Economics, 2002-2003

United States Institute of Peace Certificate of Meritorious Service, 1996

National Science Foundation Dissertation Research Grant, 1995 (declined)

Alexander George Award for Best Graduate Student Paper, Runner-Up, Foreign Policy Analysis Section, International Studies Association, 1994

Dean's Scholar Fellowship, School of International Service, American University, 1989-1992

Graduate Research and Teaching Assistantship, School of International Service, American University, 1989-1992

American Hellenic Educational Progressive Association (AHEPA) College Scholarship, 1986

Political Science Student of the Year, Wilkes-Barre Area School District, 1986